

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Case No. 1:19-cr-198

Plaintiff,

v.

Hon. Robert J. Jonker

MONICA KARINA MAZEI, aka KARINA PUING

Defendant(s).

**GOVERNMENT'S  
INITIAL PRETRIAL CONFERENCE  
SUMMARY STATEMENT**

I. DISCOVERY

A. Statements of Defendant

1. Oral Statements (Rule 16(a)(1)(A))

☐

There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).

☒

There are the following written records of oral statements:

3/20/19 Interview with KDPS, No. 19-003948

The substance of which

☐

has been disclosed to defense counsel.

☒

will be disclosed to defense counsel by protective order pending.

2. Written or Recorded Statements (Rule 16(a)(1)(B))

☒

There are no written or recorded statements or grand jury testimony of defendant.

☐

There are the following written or recorded statements or grand jury testimony:

All written or recorded statements

☐

have been disclosed to defense counsel.

☐

will be disclosed to defense counsel by \_\_\_\_\_.

B. Defendant's Prior Record (Rule 16(a)(1)(D))

- ☒ The Government has made due inquiry and is not aware of any prior criminal record.
- ☐ The Government has disclosed defendant's prior criminal history.
- ☐ The Government is now making inquiry into defendant's prior criminal history. The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects (Rule 16(a)(1)(E))

- ☐ The Government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The Government has the following documents, tangible objects, and physical evidence:
- ☐ Drug Paraphernalia      ☐ Drug Records      ☐ Inventory (attached)
- ☐ Controlled Substances: \_\_\_\_\_
- ☒ Records: Bank records, texts, voicemail, tax info, immigration documents
- ☐ Firearms: \_\_\_\_\_
- ☒ Other: Items seized during search of defendant's residence (see returns)
- ☒ The Government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
- ☒ State
- ☐ Federal:
- |                                |  |
|--------------------------------|--|
| Case No. <u>KDPS 19-003948</u> | Re: <u>2842 Bronson Blvd</u>                 |
| Case No. <u>KDPS 19-003948</u> | Re: <u>Advia CU, Kalsee CU, Consumers CU</u> |
| Case No. _____                 | Re: _____                                    |
- ☒ They have been made available for inspection and copying by defense counsel.
- ☒ Defense counsel should make arrangements with:  
SA Tom Schifini, HSI

D. Reports of Examinations and Tests (Rule 16(a)(1)(F))

- ☒ The Government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☐ The Government has or expects to have reports of the following examinations and tests:
- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Drug Analysis      | <input type="checkbox"/> Handwriting    | <input type="checkbox"/> Fingerprints    |
| <input type="checkbox"/> DNA                | <input type="checkbox"/> Firearms/Nexus | <input type="checkbox"/> Gun Operability |
| <input type="checkbox"/> Computer Forensics | <input type="checkbox"/> Other: _____   |  |

E. Reciprocal Discovery

- ☒ The Government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- ☒ The Government does not presently intend to introduce 404(b) evidence.
- ☐ The Government does presently intend to introduce the following 404(b) evidence:

- ☐ The Government will provide pretrial notice of 404(b) evidence by \_\_\_\_\_ .

G. Other Discovery Matters

II. TRIAL

- A. The Government requests a ☒ jury ☐ non-jury trial.
- B. The length of trial excluding jury selection is estimated at 2-3 days .

III. MISCELLANEOUS

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

- ☒ The Government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.
- ☐ The Government is aware of the following potential conflicts:

- ☒ Government's plea negotiation policy:

No consideration for pleas entered less than 2 weeks before Final Pretrial Conference.

Date August 23, 2019

Nils R. Kessler  
Counsel for the United States